

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

JOHN DOE,

Plaintiff,

v.

C.A. NO.: 17-191-JJM

BROWN UNIVERSITY,

Defendant.

AFFIDAVIT OF STEVEN M. RICHARD

I, Steven M. Richard, state under oath as follows:

1. I am a partner at Nixon Peabody LLP and counsel of record for Defendant Brown University (“Brown”). I am executing this affidavit to submit exhibits in support of Brown’s motion to require Plaintiff to proceed under his real name.
2. I reviewed Plaintiff’s LinkedIn and Instagram pages as they are publicly available on the Internet.
3. Attached as Exhibit A is a printout of Plaintiff’s LinkedIn page as of September 27, 2018. On page 3 of the printout, Plaintiff has published on his LinkedIn page his graduation from Brown, as well as references to his extracurricular activities including his participation on a Brown varsity sports team.
4. Attached as Exhibit B are printouts of two pictures posted on Plaintiff’s Instagram page as of September 27, 2018, which were taken at Brown’s May 2018 graduation ceremonies.
5. Attached as Exhibit C is Plaintiff’s Rule 26(a)(1) disclosure as served on September 26, 2018.


Steven M. Richard (#4403)

STATE OF RHODE ISLAND
PROVIDENCE, SC.

Signed and sworn before me on this 1st day of October, 2018.


Collette R. Palmer
Notary Public # 34464
My Commission Expires: 03/16/2022

CERTIFICATE OF SERVICE

I certify that, on this 9th day of October 2018, this affidavit was filed and served via the Court's CM/ECF system.

/s/ Steven M. Richard

EXHIBITS A-C

(FILED UNDER SEAL)